

Matthew W. Gissendanner
Senior Counsel
Dominion Energy Services, Inc.

220 Operation Way, MC C222, Cayce, SC 29033
DominionEnergy.com



June 21, 2021

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

RE: United States Department of Defense and all other Federal Executive
Agencies' Petition for an Order Granting a Waiver of the Queue
Requirement of the South Carolina Generator Interconnection
Procedures
Docket No. 2021-200-E

Dear Ms. Boyd:

Enclosed for filing on behalf of Dominion Energy South Carolina, Inc. ("DESC")
is a Petition to Intervene in the above-referenced docket.

By copy of this letter DESC is providing a copy of the Petition to Intervene to
the parties of record and encloses a certificate of service to that effect.

If you have any questions, please advise.

Very truly yours,

A handwritten signature in blue ink that reads "Matthew W. Gissendanner".

Matthew W. Gissendanner

MWG/kms
Enclosures

cc: Emily W. Medlyn, Esquire
Jeffrey M. Nelson, Esquire
(both via electronic mail and U.S. First Class Mail w/enclosures)

United States Department of Defense and all other Federal Executive Agencies' Petition for an Order Granting a Waiver of the Queue Requirement of the South Carolina Generator Interconnection Procedures

DOMINION ENERGY SOUTH CAROLINA, INC.'S PETITION TO INTERVENE AND RESPONSIVE COMMENTS TO PETITION

Pursuant to S.C. Code Ann. Regs. 103-825(A)(3) and other applicable rules and regulations of the Public Service Commission of South Carolina (the “Commission”), Dominion Energy South Carolina, Inc. (“DESC”) hereby petitions to intervene as a party of record in the above-referenced proceeding and provides responsive comments to the Petition for an Order Granting a Waiver of the Queue Requirement of the South Carolina Generator Interconnection Procedures filed in this docket on June 15, 2021 (the “Petition”).

PETITION TO INTERVENE

In support of its Petition to Intervene, DESC hereby shows the following:

1. DESC is a corporation duly organized and existing under the laws of the State of South Carolina, with its principal offices at 220 Operation Way, Cayce, South Carolina 29033.
2. DESC is engaged, in part, in the business of generating, transmitting, and delivering electricity and providing electric service to the public for compensation.

3. Corporate legal counsel for DESC in this proceeding are as follows:

K. Chad Burgess, Esquire
 Matthew W. Gissendanner, Esquire
 Dominion Energy Services, Inc.
 Mail Code C222
 220 Operations Way
 Cayce, South Carolina 29033-3701
 Phone (803) 217-8141 (Burgess)
 Phone (803) 217-5359 (Gissendanner)
 Email: chad.burgess@dominionenergy.com
 Email: matthew.gissendanner@dominionenergy.com

All correspondence and any other matters relative to this proceeding should be addressed to these representatives.

4. The United States Department of Defense and all other Federal Executive Agencies (“DoD/FEA”) filed the Petition with the Commission.

5. The Petition is related to DoD/FEA’s Combined Heat and Power Project located at Fort Jackson (“Project”), which is to be interconnected to the DESC system under the terms of the South Carolina Generator Interconnection Procedures (“SCGIP”).

6. With respect to the Project, the Petition requests that the Commission issue an order granting a waiver of the requirement of the SCGIP that the Project be studied in serial queue order (the “Queue Requirement”) and directing Dominion Energy South Carolina to immediately conduct its study and review of the Project under the terms of the SCGIP.

7. DESC is required to administer its interconnection queue in conformance with SCGIP, which is the topic of the Petition.

8. DESC has a general interest in the Commission’s interpretation of the SCGIP and its applicability and a direct and real interest in the Commission’s interpretation of the SCGIP and

its applicability (including grants or denials of waivers of specific portions of the SCGIP) to projects seeking to interconnect to the DESC system.

9. DESC's interest cannot be adequately represented by any other party to this proceeding.

10. DESC has a direct and real interest in the Commission's consideration of the Petition.

11. DESC's intervention is timely.¹

12. Furthermore, DESC's responsive comments to the Petition and its intervention in this proceeding will provide the Commission and its staff relevant information to form a complete record upon which the Commission will make its decision.

RESPONSIVE COMMENTS TO THE PETITION

DESC provides the following comments in response to the Petition. As stated in the Petition, DoD/FEA consulted with DESC prior to filing the Petition. Based on Commission Order Number 2020-535 and the unique facts and circumstances of this case, DESC has no objection to DoD/FEA's request for a waiver of the Queue Requirement. Upon the Commission's issuance of a waiver of the Queue Requirement to DoD/FEA, DESC will expedite its review, perform the necessary studies, and proffer an interconnection agreement ("IA") that would allow the Project to operate upon execution and compliance with the terms of the IA.

CONCLUSION

For the reasons stated herein, DESC respectfully requests that the Commission grant DESC's Petition to Intervene.

¹ The above-captioned docket was established when DoD/FEA filed the Petition on June 15, 2021, and no timeline for intervention has been established.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Matthew W. Gissendanner". The signature is written in a cursive style and is positioned above a horizontal line.

K. Chad Burgess, Esquire

Matthew W. Gissendanner, Esquire

Dominion Energy South Carolina, Inc.

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Attorneys for Dominion Energy South Carolina, Inc.

Cayce, South Carolina
June 21, 2021

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2021-200-E

IN RE:

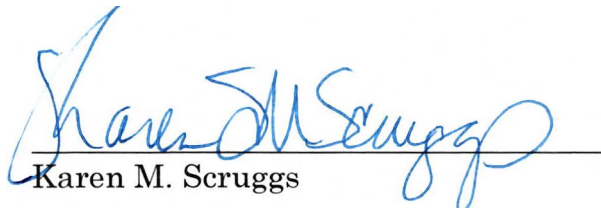
United States Department of Defense and all other)
Federal Agencies' Petition for an Order Granting a)
Waiver of the Queue Requirement of the South)
Carolina Generator Interconnection Procedures)
_____)

**CERTIFICATE OF
SERVICE**

This is to certify that I have caused to be served this day copies of **Dominion Energy South Carolina, Inc.'s Petition to Intervene** to the persons named below at the addresses set forth via U.S. First Class Mail and electronic mail:

Emily W. Medlyn, Esquire
U.S. Army Legal Services Agency – Regulatory Law
8275 Gunston Road
Fort Belvoir, VA 22060
emily.w.medlyn.civ@mail.mil

Jeffrey M. Nelson, Esquire
South Carolina Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
jnelson@ors.sc.gov



Karen M. Scruggs

Cayce, South Carolina

This 21st day of June 2021